

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

INTELLECTUAL VENTURES I LLC AND  
INTELLECTUAL VENTURES II, LLC,

Plaintiff,

vs.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 4:24-cv-00980

JURY TRIAL

DECLARATION OF KENNETH SCOTT IN SUPPORT OF DEFENDANT AMERICAN  
AIRLINES, INC.'S MOTION TO ENFORCE THE LOCAL RULES AND STRIKE  
PLAINTIFFS' MOTION FOR LEAVE

I, Kenneth Scott, hereby state as follows:

1. I am an attorney at McKool Smith, P.C., and counsel for American Airlines, Inc. ("American") in this action.

2. I provide this declaration in support of Defendant American Airlines, Inc.'s Motion to Enforce the Local Rules and Strike Plaintiffs' Motion for Leave.

3. **Exhibit 1** is a true and correct copy of email exchange between Plaintiffs and Defendant's counsel from May 21 to May 23, 2025 related to the Motion for Leave to File an Amended Complaint.

4. **Exhibit 2** is a true and correct copy of an *SynQor Inc. v. Vicor Corp.*, No. 2:14-CV-00287-RWS-JBB, Dkt. 565 at 15 (E.D. Tex. Sep. 13, 2022).

5. **Exhibit 3** is a true and correct copy of *Barkan Wireless Access Techs., L.P. v. Cellco P'ship*, No. 2:16-CV-00293-JRG-RSP, Dkt. 43 (E.D. Tex. Feb. 27, 2017).

6. **Exhibit 4** is a true and correct copy of *Quantum World Corp. v. Atmel Corp.*, No.

2:07-CV-24-CE, Dkt. 175 (E.D. Tex. Nov. 26, 2008).

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 6th day of June 2025 in Austin, Texas.

/s/Kenneth Scott  
Kenneth Scott